

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Develop a
Successor to Existing Net Energy Metering Tariffs
Pursuant to Public Utilities Code Section 2827.1,
and to Address Other Issues Related to Net
Energy Metering.

Rulemaking 14-07-002
(Filed July 10, 2014)

**SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)
COMMENTS ON ADMINISTRATIVE LAW JUDGE
RULING REGARDING ASSEMBLY BILL 693**

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November 2, 2015

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**I.
INTRODUCTION AND BACKGROUND**

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”) and the *Administrative Law Judge’s Ruling Seeking Comment on AB 693* (“ALJ Ruling”) issued in the above-captioned proceeding on October 21, 2015, San Diego Gas & Electric Company (“SDG&E”) hereby submits these comments regarding the impact of Assembly Bill (“AB”) 693^{1/} on its proposal for a disadvantaged communities program to be adopted as a component of the net energy metering (“NEM”) successor tariff pursuant to Public Utilities Code § 2827.1.^{2/}

AB 693 provides, in pertinent part:

Adoption and implementation of the Multifamily Affordable Housing Solar Roofs Program may count toward the satisfaction of the commission’s obligation to ensure that specific alternatives designed for growth among residential customers in disadvantaged communities are offered as part of the standard contract or tariff authorized pursuant to paragraph (1) of subdivision (b) of Section 2827.1.

^{1/} Stats. 2015, Ch. 582.

^{2/} All statutory references herein are to the Public Utilities Code unless otherwise noted.

Public Utilities Code § 2827.1(b)(1) directs the Commission to ensure that the successor NEM tariff or contract adopted pursuant to § 2827.1 includes “specific alternatives designed for growth among residential customers in disadvantaged communities.” Accordingly, as part of SDG&E’s *Proposal for Successor NEM Tariff* filed August 3, 2015 (“August 3 Proposal”), SDG&E offered its proposal for disadvantaged communities (“Disadvantaged Communities Program”).^{3/}

In accordance with the direction provided by the ALJ Ruling, SDG&E provides responses to the specific questions set forth in the ALJ Ruling in Section III below. In addition, SDG&E provides the information requested in Section 3 of the ALJ Ruling in Attachment A hereto.

II. SUMMARY OF SDG&E’S DISADVANTAGED COMMUNITIES PROPOSAL

SDG&E supports access by all customers to cost-effective distributed energy resources (“DERs”) and views universal access as an important element of the State’s clean energy strategy. SDG&E’s support of universal access to cost-effective DERs is reflected in its recently-filed Distribution Resource Plan (“DRP”) and enabling universal access is the foundation for SDG&E’s proposed Disadvantaged Communities Program. SDG&E’s proposal is designed to support an overall “greening” of under-served communities while helping these communities overcome the barriers that have persisted in restricting the installation of solar energy systems, primarily on multi-family complexes, but also in single family homes. SDG&E’s intent in offering these programs is to provide solar options to communities that have not historically been sought after by the wider commercial solar market.

^{3/} *San Diego Gas & Electric Company Proposal for Successor NEM Tariff*, filed August 3, 2015, Attachment B.

SDG&E's proposed Disadvantaged Communities Program is designed to complement other programs aimed at assisting customers located in disadvantaged communities, such as the California Solar Initiative's ("CSI's") Multifamily Affordable Solar Housing ("MASH") and Single-Family Affordable Solar Homes ("SASH") programs, and to strengthen the overall portfolio of customer offerings for solar. SDG&E's proposed Disadvantaged Communities Program is described in detail in Attachment B to SDG&E's August 3 Proposal; in summary, it includes two elements – the Multi-Family Solar Share program (the "MF Program") and the Solar At Schools program ("Schools Program"). The MF Program and the Schools Program both involve installation of utility-owned solar photovoltaic ("PV") systems on customer-owned buildings that meet certain eligibility criteria and are located in Disadvantaged Communities (as that term is defined in SDG&E's Disadvantaged Communities Program). Specifically, SDG&E proposes to:

- (i) Install the solar PV system at no cost to the multi-family building owner/school, and operate and maintain the system. The proposed program would allow a building owner to request uninstallation and reinstallation of the solar PV system one time during the life of the system;
- (ii) Pay the building owner/school a lease payment based upon the size of the PV system. SDG&E proposes a lease payment of \$5.00 per kW, paid annually for 20 years from the system in-service date;
- (iii) Provide a bill credit to residential customers as follows:
 - a. Under the MF Program, residential customers in multi-family buildings would receive credits for generation produced by the on-site solar system. Generation would be separately metered and all energy generated on-site would be credited at a rate consistent with SDG&E's Sun Credits NEM successor tariff option, currently proposed as the system average commodity rate. Credited generation would be allocated and presented as bill credits for the building owner and tenants at that site. The building owner would receive an allocation of the generation credit for common area energy accounts, not to exceed 5% of the total energy generated on-site and not to exceed 100% of common area energy usage.

- b. Under the Schools Program, low-income residential customers (both single family and multi-family residences) residing within the census tract of the school would receive credits for generation produced by the on-site solar system at the relevant school. Generation would be separately metered and all energy generated on-site would be credited at a rate consistent with SDG&E's Sun Credits NEM successor tariff option, currently proposed as the system average commodity rate. Credited generation would be allocated and presented as bill credits for eligible low-income residential customers residing within the census tract of the relevant school.
- (iv) SDG&E proposes a total funding cap of \$50 million for the Disadvantaged Communities Program, with solar PV systems to be installed over 5 years and operated for 20 years (the average life of the system), with the option for renewal or extension with modifications based on performance. SDG&E further proposes that the utility-owned PV systems be maintained and rate-based for the life of the system (20 years). The option of PV system removal and replacement would be offered at a maximum of one time in the system's life. With a program budget capped at \$50 million, the revenue requirement is calculated to be \$71.5 million over 25 years.

Participants in both the MF Program and the Schools Program would continue to take electric service under their otherwise applicable tariff ("OAT"). Customers would also continue to be eligible for other assistance programs.

III. RESPONSES TO QUESTIONS IN ALJ RULING

1. **Should the Commission use the Multifamily Affordable Housing Solar Roofs Program (Program) to satisfy, in part or in whole, the statutory obligation to ensure that the standard contract or tariff includes "specific alternatives designed for growth among residential customers in disadvantaged communities?" Why or why not? Please discuss to what extent, if at all, your response depends on the program structure adopted by the Commission to implement the Program, including:**
 - a. **Whether the Program provides an alternative for all residential customers included in your preferred definition of "disadvantaged community."**
 - b. **If you believe the Program would not provide a complete response to the statutory obligation, what proposal or proposals already presented in this proceeding should also be adopted in order to satisfy the statutory obligation set out in Section 2827(b)(1)?**

RESPONSE:

As SDG&E notes above and in its August 3 Proposal, it strongly supports universal access to cost-effective DERs and recognizes the value of offering different programs to provide distributed generation (“DG”) solutions to disadvantaged communities (*e.g.*, MASH, SASH). SDG&E’s proposed Disadvantaged Communities Program is intended to operate as a complement to existing programs, addressing issues that those programs are not designed to resolve or have failed to resolve. SDG&E’s proposed Disadvantaged Communities Program is a new approach to promoting solar adoption within disadvantaged communities that augments the incentive-based approach offered through existing programs. This new approach will promote even greater adoption of DG within residential disadvantaged communities.

AB 693 reflects “the goal of the state to make qualifying solar energy systems more accessible to low-income and disadvantaged communities and, as in the case of the Multifamily Affordable Housing Solar Roofs Program, to install those systems in a manner that represents the geographic diversity of the state.”^{4/} SDG&E supports this goal and looks forward to working with stakeholders to implement AB 693 in a manner that accomplishes the objectives outlined in the statute. It notes, however, that certain aspects of the legislation operate to limit its applicability and that the AB 693 program will not resolve many of the issues that SDG&E’s proposed Disadvantaged Communities Program is designed to address. Thus, as discussed in more detail below, while AB 693 may be effective in spurring some degree of growth in customer-sited renewable DG among low-income residential customers located in disadvantaged communities, it does not obviate the need for SDG&E’s proposed Disadvantaged Communities

^{4/} Sec. 1(e).

Program in order to effectuate the intent of § 2827.1 to promote meaningful growth within the larger disadvantaged communities (including low-income customers, non-low-income customers, and customers residing in both single family and multi-family homes).

Certain parameters of the AB 693 program – for example eligibility and funding – are defined in the statute. Thus, while the program has not yet been implemented by the Commission, it is possible to evaluate and compare some aspects of the AB 693 program against SDG&E’s proposed Disadvantaged Communities Program.

(i) Eligibility

In terms of eligibility, the AB 693 program is open only to low-income residential customers located in a “qualified multifamily affordable housing property,” which is defined as:

(3) “Qualified multifamily affordable housing property” means a multifamily residential building of at least five rental housing units that is operated to provide deed-restricted low-income residential housing, *as defined in clause (i) of subparagraph (A) of paragraph (3) of subdivision (a) of Section 2852*, and that meets one or more of the following requirements:

(A) The property is located in a disadvantaged community, as identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code.

(B) At least 80 percent of the households have incomes at or below 60 percent of the area median income, as defined in subdivision (f) of Section 50052.5 of the Health and Safety Code.^{5/}

SDG&E’s Disadvantaged Communities Proposal and the AB 693 program will assist different groups of customers in installing rooftop solar. Specifically, unlike AB 693, SDG&E’s proposed Disadvantaged Communities Program offers alternatives for both low-income and non-low-income residential customers living in disadvantaged communities, and provides options for both multi-family and single family residences.

^{5/} § 2870(a)(3).

As noted above, the AB 693 program is open only to deed-restricted low-income multi-family buildings with tenants that meet certain income and demographic requirements. Under SDG&E's proposal, eligibility is defined to target a different group of disadvantaged community. SDG&E's proposed MF Program requires that multi-family buildings be located in a disadvantaged community to be eligible, but the low-income restriction is only partially applied. To wit, SDG&E proposes that for the first three years of the MF Program, it would reserve 25% of the MF Program budget for buildings with 20% low-income residents, as currently defined in the MASH program; in years four and five of the MF Program, any portion of that unused reserved capacity for low-income units would be made available to the other building owners meeting the rest of the eligibility criteria. SDG&E's proposal recognizes the value of renewable projects within disadvantaged communities to mitigate local environmental burdens regardless of the income level of each individual customer residing in a multi-unit dwelling in the disadvantaged community.

In addition, AB 693 limits eligibility to buildings with "at least five *rental housing units*,"^{6/} which excludes single family homeowners and appears to prohibit condominium owners located in disadvantaged communities from participating in the program.^{7/} SDG&E's proposed Disadvantaged Communities Program, by contrast, provides options for single family homeowners and condominium owners. Specifically, the Schools Program includes benefits for both single family and multi-family residences, while the MF Program benefits renters, building owners and homeowners associations ("HOAs").

^{6/} Emphasis added. Under the AB 693 program, eligible building must have at least 5 units; the MF proposal requires that building have at least 25 units.

^{7/} See § 2870(a)(3).

Finally, the definition of “disadvantaged communities” proposed by SDG&E is different from the definition adopted in AB 693. SDG&E’s preferred definition uses the CalEnviroScreen to target the top 20% of census tracts identified as disadvantaged within the California EPA’s CalEnviroScreen 2.0 tool by investor-owned utility (“IOU”) territory. AB 693 identifies the Cal EPA’s work as the basis of the definition to be used, but it does not specify how to use the tool (*i.e.*, what percentage of the tracts are to be considered “disadvantaged”). Thus, the definition adopted for purposes of implementing AB 693 may ultimately differ from that proposed by SDG&E.

(ii) Funding

With regard to funding the AB 693 program, the statute provides that the AB 693 program in each of the three IOUs’ service territories will be funded by the lesser of the IOU’s allocated share of \$100,000,000 authorized by the Commission or 10% of available funds from revenues described in §748.5(c).^{8/} The statute does not define the methodology for allocating the \$100,000,000 annual funding amount. SDG&E notes that this issue will likely be addressed in the implementation of AB 693 and does not offer its definitive position here, but observes that such statewide allocation could be accomplished based on the allocation of MASH funds within CSI. Under this approach, SDG&E’s allocated share of the MASH budget is approximately 10% so its annual AB 693 funding is unlikely to exceed \$10,000,000.^{9/} As noted above, the AB 693 funding received by SDG&E would be the lesser of (1) approximately \$10,000,000 depending on annual adjustments or (2) 10% of available funds from revenues described in §748.5(c).

^{8/} § 2870(c).

^{9/} See D.08-10-036, *mimeo* p. 18.

Section 748.5 addresses the disposition of revenues received by the IOUs as the result of the direct allocation of greenhouse gas (“GHG”) allowances. It requires that such revenues be credited directly to certain specified customers, but §748.5(c) permits the Commission to allocate up to 15% of GHG allowance revenues to fund certain clean energy and energy efficiency projects. Using 2015 projections for illustrative purposes, SDG&E estimates that it will have approximately \$11 million in revenues for 2015 to allocate to clean energy and energy efficiency projects under § 748.5(c).^{10/} AB 693 provides that 10% of “available funds” under §748.5(c) may be used to fund AB 693 projects, which for SDG&E would mean \$1.165 million in available funding, at most. As a practical matter, the “available funds” could be 10% of an amount that is lower than the full 15% (\$11 million for SDG&E) due to some portion of the 15% being allocated to other, non-AB 693 projects.

TABLE 1

Illustrative Calculation

2015	Calculation* 1	Calculation* 2	
	SDG&E's share (10%**) of \$100 MM	15% of Estimated Revenues from GHG Allowances	10% of 15% of GHG Allowance Revenues
	\$10 million	\$11.645 million	\$1.165 million

*Calculations: Lower of one hundred million dollars (\$100,000,000) **or** 10 percent of available §748.5(c) funds

**Typical allocation of statewide funds to SDG&E

For the following years (2016 – 2020) the amount available could be modestly higher, but is unlikely to exceed \$1.5 million annually. Thus, the level of funding available to SDG&E under the funding approach outlined AB 693 is likely to be extremely limited. Funding could be

^{10/} See Prepared Testimony of Alex Kim in support of *Application of SDG&E for Approval of Low-Income Assistance Programs and Budgets for Years 2015-2017* (A.14-11-009), dated November 18, 2014, p. AYK-20. Available at: <http://www.liob.org/docs/2015-2017%20ESA%20CARE%20SDG&E%20Application%20and%20Testimony.pdf>.

reduced further if the Commission elects to fund other clean energy and energy efficiency projects that are currently pending before the Commission. By contrast, SDG&E's proposal provides \$50 million of funding for rooftop solar in disadvantaged communities. The modest amount of available funding under AB 693 is not likely to result in significant growth in adoption of onsite DG in disadvantaged communities on its own; SDG&E's Disadvantaged Communities Program should be adopted now as a complement to the future AB 693 program. Approval of both programs with their associated funding mechanisms will encourage greater adoption of renewables in disadvantaged communities.

(iii) *Incentive-Based*

SDG&E notes that AB 693 appears to envision direct monetary incentives to property owners for installation of onsite DG on eligible properties that benefit tenants of the property. The incentives provided under AB 693 may be up to 100% of the total system installation costs, but presumably would be less depending upon the level of funding and the number of systems participating in the program. In this respect, the AB 693 program is similar to the MASH and SASH programs, which offer fixed, up-front, capacity-based incentives for qualifying solar energy systems.^{11/}

SDG&E notes that the direct incentive approach, as contemplated in AB 693, has not led to meaningful growth in adoption of onsite solar in disadvantaged communities within SDG&E's service territory. While the up-front incentives offered under the MASH/SASH programs fill a particular gap in the development of the market, these incentive-based programs do not overcome or remove the many barriers to adoption that exist in the current environment. Data

^{11/} § 2870(f)(1) ("the commission shall authorize the award of monetary incentives for qualifying solar energy systems . . ."); § 2870(f)(2) ("[t]he commission shall require that the electricity generated by qualifying renewable energy systems installed pursuant to the program be primarily used to offset electricity usage by low-income tenants.").

presented in the Energy Division Staff Paper show that even with availability of the MASH/SASH incentives, there have been only 0.304 MWs of solar installed in the disadvantaged communities (as defined by Staff) located in SDG&E's service territory.^{12/} This is 0.36% of total residential installs in SDG&E's territory in 2014. The extremely low level of onsite DG adoption – even with the availability of MASH/SASH incentives – suggests that incentive-based programs such as MASH/SASH and AB 693 may not help customers to overcome the current barriers to onsite DG adoption, most particularly economic and property ownership barriers, as well as property structure barriers. These barriers to adoption are discussed in more detail in response to Question 2, below.

Taking into account AB 693's eligibility requirements, funding limitations and the incentive-based nature of the program, it is clear that the need and justification for SDG&E's proposed Disadvantaged Communities Program continues to exist. Thus, while SDG&E supports the goals set forth in AB 693, it submits that approval of its proposed Disadvantaged Communities Program is still necessary and in the public interest notwithstanding adoption of this new legislation. SDG&E's proposed Disadvantaged Communities Programs is intended to operate as a complement to existing programs – addressing issues that those programs are not designed to resolve – and furthers the promotion of universal access to cost-effective DERs. SDG&E's proposal will achieve the intent of § 2827.1 to promote meaningful DG growth within disadvantaged communities for both multi-family and single family dwellings. Accordingly, the Commission should approve SDG&E's proposed Disadvantaged Communities Program as a component of the successor tariff adopted in the instant proceeding.

^{12/} See *Energy Division Staff Paper Presenting Proposals for Alternatives to the NEM Successor Tariff or Contract for Residential Customers in Disadvantaged Communities in Compliance with AB 327*, issued June 4, 2015 ("Staff Paper"), Table 2.

- 2. If your previous proposal and/or comments include a discussion of barriers that residential customers in disadvantaged communities face in adopting customer-sited renewable distributed generation, discuss which, if any, of these barriers would be addressed by the Program. Please specifically identify and comment on the extent to which the Program does or does not address each barrier.**

RESPONSE:

SDG&E's August 3 Proposal sets forth a detailed discussion of the barriers that prevent robust solar adoption in disadvantaged communities, as well as the effectiveness of SDG&E's proposed Disadvantaged Communities Program in overcoming those barriers.^{13/} Of particular relevance here are economic barriers, barriers related to property ownership and property structure barriers.

With regard to economic barriers and barriers related to property ownership, many low-income residential customers in California are renters. Many also live in multi-family housing. These tenancy arrangements commonly present barriers to adoption of onsite DG. As the Staff Paper acknowledges, "the decision to go solar would be the property owner's and not the tenant's."^{14/} Purchase of onsite solar systems by the building owner of a multi-family housing complex is often cost-prohibitive in disadvantaged communities where those costs would be passed on to residents, either in the form of higher HOA fees or higher rents for lower-income residents. In addition, building owners may lack incentive to install solar PV systems that do not provide them with a direct benefit.

While the full implementation details for AB 693 are not yet known, the legislation appears to contemplate payment of direct incentives to owners of eligible buildings in order to reduce the costs of installing an onsite DG system. As noted above, however, incentives of this type (*e.g.*, MASH/SASH) have not proven effective in prompting owners of buildings located in

^{13/} August 3 Proposal, Appendix B, pp. B-24 – B-26.

^{14/} Staff Paper, p. 2-18.

disadvantaged communities to invest in onsite DG. Owners of low-income multi-family buildings may lack incentive to install solar PV systems that do not provide them with a direct benefit, and may be reluctant to invest (even with incentives) in onsite DG if they are unable to pass through any of the cost of doing so to their tenants. Moreover, while the building owner could be compensated up to 100% of the installation cost, it does not appear that any funding is available to cover maintenance or other non-installation costs. Finally, AB 693 offers a solution for residents living in multi-family buildings located in disadvantaged communities, but fails to provide alternatives for residents living in single family homes located in disadvantaged communities.

SDG&E's proposed Disadvantaged Communities Program provides building owners with a total incentive package to install rooftop solar and provides operations and maintenance of the system without a financial cost to either the participating building owner or the customer beneficiary. SDG&E's proposed Disadvantaged Communities Program is also available to residential customers located in both multi-family and single-family residences. Thus, it overcomes the economic as well as ownership barriers for residential customers located within disadvantaged communities, as discussed in more detail in SDG&E's August 3 Proposal.

As noted above, another significant barrier to adoption of onsite DG in disadvantaged communities relates to property structure concerns arising from the aging housing stock and, in particular, roof quality. Owners of multi-family buildings eligible to participate in the AB 693 program may be reluctant to invest in onsite DG if they perceive that it will be necessary to replace the roof of the relevant building at some point in the foreseeable future. AB 693 does not address this concern, which can be a significant factor in the decision whether to install solar. SDG&E's Disadvantaged Communities Proposal, on the other hand, would offer a one-time

system removal and re-installation for the purposes of allowing the building owner to replace the roof, if needed. Thus, SDG&E's program effectively overcome the specific barrier of aging roofs in a manner that will encourage participation.

- 3. Does AB 693 change any of your previous proposals or comments on other parties' proposals for alternatives for disadvantaged communities? Specifically identify how, if at all, your previous comments/proposals are affected by AB 693. Please discuss the reasons in detail. If you believe that consideration of AB 693 leads to significant changes to your previously submitted proposal, please provide both a clean new version and a redline version of your proposal as an attachment to your comments.**

RESPONSE:

Adoption of AB 693 does not necessitate modification of SDG&E's Disadvantaged Communities Proposal.

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Respectfully submitted this 2nd day of November, 2015.

/s/ Aimee M. Smith

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ATTACHMENT A

Top 20% of impacted census tracts in SDG&E Service Area

Number of census tracts included: 136

Number of residential customers, as measured by residential electric meters, and including all residential customer schedules (DR, DRLI, TOU-DR, DRTOU, DRSES, EVTOU, EVTOU2, DM, DS, DT, DTRV): 207,853

Number of residential electric customers in SDG&E territory = 1.266 million

Census Tract	County	City	Residential Electric Meters
6073009511	San Diego	San Diego	4
6073019002	San Diego	Fallbrook	521
6073013103	San Diego	Chula Vista	524
6073013205	San Diego	Chula Vista	532
6073012101	San Diego	National City	616
6073021900	San Diego	National City	631
6073010111	San Diego	San Ysidro	650
6073005000	San Diego	San Diego	663
6073012002	San Diego	National City	692
6073013204	San Diego	Chula Vista	704
6073012200	San Diego	National City	721
6073003602	San Diego	San Diego	756
6073005700	San Diego	San Diego	759
6073003601	San Diego	San Diego	760
6073004700	San Diego	San Diego	786
6073011602	San Diego	National City	811
6073010015	San Diego	San Diego	824
6073008701	San Diego	San Diego	867
6073003304	San Diego	San Diego	867
6073013312	San Diego	Chula Vista	872
6073012003	San Diego	National City	913
6073013307	San Diego	Chula Vista	923
6073012102	San Diego	National City	925
6073012501	San Diego	Chula Vista	928
6073015901	San Diego	El Cajon	932
6073003301	San Diego	San Diego	958
6073002711	San Diego	San Diego	962
6073020213	San Diego	Escondido	998
6073013308	San Diego	Chula Vista	1015
6073003603	San Diego	San Diego	1018
6073003901	San Diego	San Diego	1025
6073014806	San Diego	La Mesa	1034
6073003403	San Diego	San Diego	1090
6073011801	San Diego	National City	1092
6073003501	San Diego	San Diego	1094
6073015301	San Diego	El Cajon	1097
6073020403	San Diego	Escondido	1130
6073004800	San Diego	San Diego	1138

6073003404	San Diego	San Diego	1139
6073003303	San Diego	San Diego	1155
6073004600	San Diego	San Diego	1166
6073020309	San Diego	Escondido	1170
6073002710	San Diego	San Diego	1200
6073002709	San Diego	San Diego	1212
6073003305	San Diego	San Diego	1220
6073016617	San Diego	Santee	1223
6073010109	San Diego	San Diego	1234
6073017502	San Diego	Encinitas	1234
6073003001	San Diego	San Diego	1236
6073012502	San Diego	Chula Vista	1239
6073003502	San Diego	San Diego	1250
6073004000	San Diego	San Diego	1255
6073010103	San Diego	San Diego	1268
6073002602	San Diego	San Diego	1284
6073003902	San Diego	San Diego	1290
6073014300	San Diego	Lemon Grove	1294
6073015302	San Diego	El Cajon	1328
6073022000	San Diego	National City	1331
6073009000	San Diego	San Diego	1359
6073002301	San Diego	San Diego	1367
6073011902	San Diego	National City	1369
6073016616	San Diego	Santee	1375
6073010005	San Diego	San Ysidro	1376
6073002201	San Diego	San Diego	1386
6073012401	San Diego	Chula Vista	1386
6073020500	San Diego	Escondido	1399
6073012600	San Diego	Chula Vista	1406
6073010012	San Diego	San Ysidro	1422
6073010013	San Diego	San Ysidro	1428
6073002402	San Diego	San Diego	1434
6073004900	San Diego	San Diego	1437
6073018519	San Diego	Oceanside	1471
6073009604	San Diego	San Diego	1487
6073020601	San Diego	Escondido	1539
6073003003	San Diego	San Diego	1559
6073002501	San Diego	San Diego	1563
6073002712	San Diego	San Diego	1569
6073016202	San Diego	El Cajon	1573
6073010009	San Diego	San Ysidro	1587
6073015801	San Diego	El Cajon	1590
6073018509	San Diego	Oceanside	1631
6073003111	San Diego	San Diego	1632
6073013206	San Diego	Chula Vista	1633
6073015802	San Diego	El Cajon	1634
6073002707	San Diego	San Diego	1634

6073010110	San Diego	San Diego	1642
6073002202	San Diego	San Diego	1772
6073002401	San Diego	San Diego	1776
6073020214	San Diego	Escondido	1791
6073011601	San Diego	National City	1805
6073003115	San Diego	San Diego	1820
6073014400	San Diego	Lemon Grove	1828
6073006500	San Diego	San Diego	1834
6073016302	San Diego	El Cajon	1838
6073008800	San Diego	San Diego	1842
6073020108	San Diego	Escondido	1853
6073012700	San Diego	Chula Vista	1864
6073020018	San Diego	San Marcos	1867
6073012402	San Diego	Chula Vista	1881
6073015701	San Diego	El Cajon	1901
6073015902	San Diego	El Cajon	1903
6073011802	San Diego	National City	1913
6073020202	San Diego	Escondido	1917
6073013104	San Diego	Chula Vista	1925
6073016301	San Diego	El Cajon	1930
6073008702	San Diego	San Diego	1961
6073009201	San Diego	San Diego	1978
6073008600	San Diego	San Diego	2000
6073002708	San Diego	San Diego	2000
6073014803	San Diego	La Mesa	2032
6073002502	San Diego	San Diego	2037
6073020308	San Diego	Escondido	2068
6073020211	San Diego	Escondido	2076
6073020019	San Diego	San Marcos	2172
6073003401	San Diego	San Diego	2183
6073016504	San Diego	El Cajon	2189
6073016201	San Diego	El Cajon	2200
6073018517	San Diego	Oceanside	2216
6073020029	San Diego	San Marcos	2226
6073020307	San Diego	Escondido	2245
6073005300	San Diego	San Diego	2256
6059042201	Orange	Capistrano Beach	2264
6073002302	San Diego	San Diego	2295
6059032022	Orange	Mission Viejo	2326
6073015703	San Diego	El Cajon	2351
6059042312	Orange	San Juan Capistrano	2392
6073016502	San Diego	El Cajon	2429
6073011700	San Diego	National City	2435
6073002703	San Diego	San Diego	2489
6073008511	San Diego	San Diego	2647
6059042310	Orange	San Juan Capistrano	2675
6073001800	San Diego	San Diego	2889

6073004100	San Diego	San Diego	2903
6073008507	San Diego	San Diego	3002
6073005100	San Diego	San Diego	3342
6073005200	San Diego	San Diego	3867

Top 25% of impacted census tracts in California

Number of census tracts included: 26

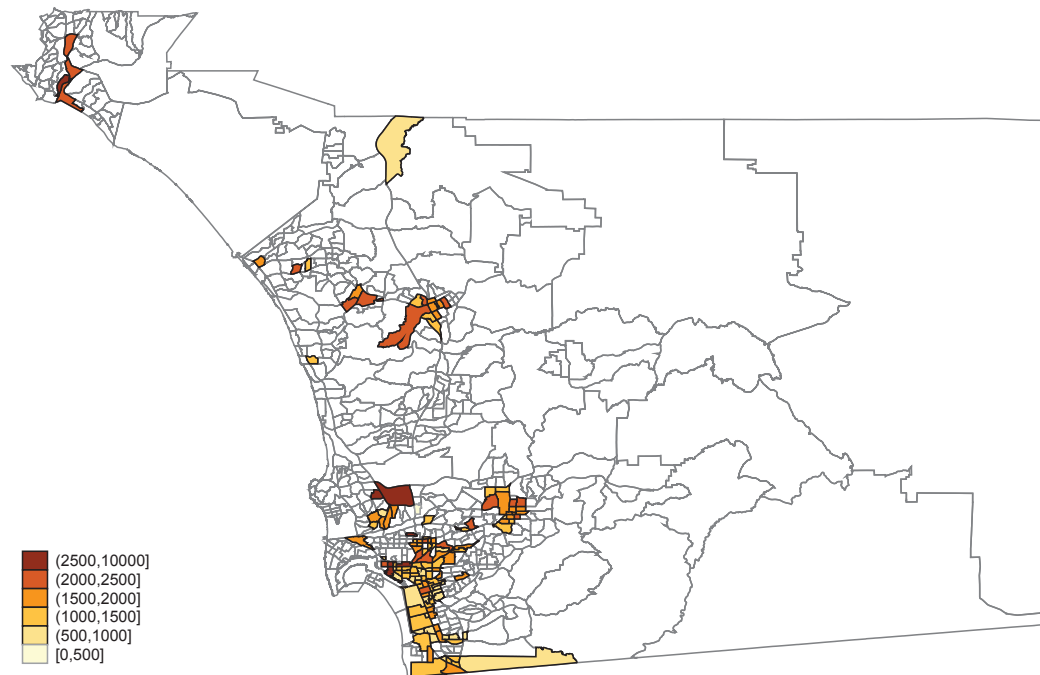
Number of residential customers, as measured by residential electric meters, and including all residential customer schedules (DR, DRLI, TOU-DR, DRTOU, DRSES, EVTOU, EVTOU2, DM, DS, DT, DTRV):
32,168

Number of residential electric customers in SDG&E territory = 1.266 million

Census Tract	County	City	Residential Electric Meters
6073013205	San Diego	Chula Vista	532
6073021900	San Diego	National City	631
6073005000	San Diego	San Diego	663
6073003602	San Diego	San Diego	756
6073003601	San Diego	San Diego	760
6073004700	San Diego	San Diego	786
6073011602	San Diego	National City	811
6073015901	San Diego	El Cajon	932
6073003301	San Diego	San Diego	958
6073003603	San Diego	San Diego	1018
6073003901	San Diego	San Diego	1025
6073003501	San Diego	San Diego	1094
6073003404	San Diego	San Diego	1139
6073003303	San Diego	San Diego	1155
6073003305	San Diego	San Diego	1220
6073012502	San Diego	Chula Vista	1239
6073003502	San Diego	San Diego	1250
6073004000	San Diego	San Diego	1255
6073003902	San Diego	San Diego	1290
6073012401	San Diego	Chula Vista	1386
6073004900	San Diego	San Diego	1437
6073015802	San Diego	El Cajon	1634
6073011601	San Diego	National City	1805
6073020018	San Diego	San Marcos	1867
6073003401	San Diego	San Diego	2183
6073005100	San Diego	San Diego	3342

SDG&E Disadvantaged Communities

Cal EnviroScreen Top 20% SDG&E Service Territory



SDG&E Disadvantaged Communities
Cal EnviroScreen Top 25% of State

